



REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

352341

JUL 22 1993

Ref: 8HWM-SM

Mr. Lawrence M. Reisinger
Director of Environment
Compliance and Management
Fort Carson, CO 80913

Re: Review of Fort Carson
under CERCLA

Dear Mr. Reisinger:

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by Section 120 of the Superfund Amendments and Reauthorization Act of 1986 (SARA), outlines the requirements for pre-remedial activities at federal facilities. Section 120(d) of CERCLA requires the Environmental Protection Agency (EPA) to ensure that all facilities on the Federal Agency Hazardous Waste Compliance Docket (docket) submit a Preliminary Assessment (PA) and, if warranted, a Site Inspection (SI) within 18 months of being placed on the docket. The PA and SI are parts of the analysis used to score the site using a mathematical model called the Hazard Ranking System (HRS). The HRS assigns risk values for four possible pathways of exposure: groundwater, surface water, air, and soil. The score based on these pathways, must be 28.50 or greater to allow further Superfund evaluation.

The EPA must evaluate the submittal of each facility and determine whether it is appropriate that the facility be included on the National Priorities List (NPL). The NPL is the list of those facilities that have been given priority for possible long-term remedial action under the federal Superfund program. Section 120(d) of CERCLA also states that 30 months after being placed on the docket, a facility which meets the eligibility criteria of the HRS be placed on the NPL. Your facility was placed on the docket 2/12/88 and was one of the sites included in the Conservation Law Foundation (CLF) lawsuit against the EPA for non-compliance with CERCLA. The resolution of the CLF lawsuit specifies that PAs be submitted by June 1992, and candidates for the NPL must be finalized by July 1993. The EPA cannot perform this work without the aid of the Federal owner or conservator. Executive Order 12580 clearly delegates the responsibility to perform the work to the U.S. Army, and leaves EPA in an oversight role. It is EPA's policy to include Federal Facilities on the NPL if they meet the eligibility criteria even if that facility is subject to corrective action under the Resource Conservation and Recovery Act (RCRA).

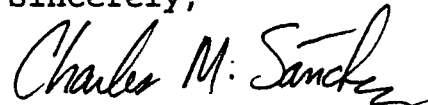
From our analysis with the HRS, EPA has determined that more information is required to allow a complete evaluation of the reports for Fort Carson, CERCLIS ID #CO2210020150. The comments for what is needed are enclosed. Once this information is received and reviewed, EPA will make one of the following determinations: (1) evaluation for possible preparation of an HRS package for possible inclusion on the NPL or (2) the site will be classified as Site Evaluation Accomplished (SEA) under the Federal Superfund program and EPA will not evaluate this site further. Please be aware, however, that when we designate a site as SEA, we are not completely closing our files on the site. If new information becomes available, EPA will review it and, if appropriate, proceed to the next phase of the evaluation. This SEA classification does not preclude the state agencies from taking action to remediate the site under state authorities.

The additional information that is being requested should be submitted to the address below:

U.S. Environmental Protection Agency
Superfund Technical Section (8HWM-SM)
999 18th Street, Suite 500
Denver, CO 80202-2466
ATTN: Charles M. Sanchez, Site Assessment Manager

Please contact me at (303) 294-7048 in order to let me know when the requested information will be submitted. Thank you for your prompt attention to this matter.

Sincerely,



Charles M. Sanchez
Site Assessment Manager

Enclosures

COMMENTS: FORT CARSON, CERCLIS ID #CO2210020150

The reports currently in the Superfund files for Fort Carson are the Installation Assessment Phase I of the Installation Restoration Program (IRP) completed in January 1983, and a Preliminary Assessment (PA) completed in October 1987. Our review under CERCLA was based on these two reports. The data that EPA needs in order to do a complete evaluation includes an up-to-date description of sources and releases, more complete sampling data, and target information. The majority of the information presented in these two reports is now 10 years old. Desk top information which should be included in the PA is also inadequate. Based on current information, the EPA is requiring information which is equivalent to a Site Inspection (SI). The purpose of the SI is to collect and analyze waste and environmental samples to support a site evaluation according to the HRS. Proper background and QA/QC samples are needed for the evaluation of the site. The National and Regional SI guidance documents are enclosed for your use. Also enclosed is the HRS Guidance manual.

In order to gather the appropriate information that is required at the PA stage, I am enclosing the PA worksheets from EPA's Region VIII PA Guidance. Please complete these sheets thoroughly as this is vital information to our evaluation of the site. At the time of the PA and IRP reports, there were a reported 40 separate locations on site where vehicles were maintained and repaired, 13 landfills and disposal systems, and an industrial wastewater treatment plant (IWTP). The current configuration and number of possible source areas is unknown. A report called the "Defense Environmental Restoration Program Annual Report to Congress" dated February 1991 indicates that the SI work for Fort Carson has been completed. I have enclosed a copy of this report for your reference. The report lists the completion of the SI for 48 sites (sources) on Fort Carson as of September 30, 1990. The EPA Superfund Technical Section has not received this report for our evaluation. Please submit this information as soon as possible as the deadline for submittal of the SI is well behind schedule as required under CERCLA Section 120. Please submit any other information that EPA may use in their evaluation under CERCLA.

Enclosed is the HRS deficiency checklist that is used when evaluating a site at the SI stage. This checklist shows what information is lacking and/or inadequate because it is not up-to-date. Some of the information that is requested in the HRS deficiency checklist will be included in the PA worksheets that have been requested to be filled out. This information may be in the reported SI that was completed according to the DOD report to Congress. Some of the information may also be included in the RCRA reports for Fort Carson. Enclosed is a list of the EPA RCRA reports that we have in our files. If some of the information that is needed for our evaluation under CERCLA is in the RCRA files, please indicate which report and page number. We may or

may not be able to use information from the RCRA reports for our CERCLA evaluation. If the information meets the criteria and requirements according the HRS, then we will apply it to our evaluation.

The information on Fort Carson indicates that there has been releases or the potential for releases of contaminants via the four pathways of concern: groundwater, surface water, soil, and air. Primary targets include the water district of Security, and the towns of Fountain, Crews, and Widefield. The lower portion of Colorado Springs is also within a three mile potentially affected radius. The reports in our files also indicate that several areas surrounding the Fort Carson Army Base use groundwater from the local alluvial aquifers which are hydraulically connected to the alluvial aquifers of Fort Carson. Potentially affected targets include groundwater users in the area, surface water users of Fountain Creek, fisheries, wetlands, soil exposure to base personnel, and possible migration of contaminants via the air pathway. The EPA needs the requested information before we can make a decision on whether to pursue further Superfund action or not.

The EPA would appreciate the information needed for our evaluation as soon as possible. If you have any questions regarding this request, please contact me at (303) 294-7048.